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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARK A. SMITHERMAN

Plaintiff,

V.

EXPERIAN INFORMATION SERVICES,
INC. EQUIFAX INFORMATION SERVICES,
LLC, TRANS UNION, LLC, and PLUSFOUR,
INC.

Defendants.

Case No.: 2:20-cv-00579-JCM-DJA

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT
PLUSFOUR INC. TO FILE ANSWER TO
PLAINTIFF'S COMPLAINT**

(FIRST REQUEST)

Plaintiff, MARK A. SMITHERMAN (“Plaintiff”) and Defendant PLUSFOUR, INC. (“Defendant”) (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate and agree as follows:

1. On March 24, 2020, Plaintiff filed his Complaint. Defendant, PLUSFOUR, INC, in the United States District Court, District of Nevada, titled *Mark A. Smitherman v. Experian Information Solutions, Inc., Equifax Information Services, LLC, Trans Union, LLC, and PlusFour, Inc.*, Case No. 2:20-cv-00579-JCM-DJA.

2. PlusFour, Inc. was served the Plaintiff's Complaint on March 31, 2019 through a registered agent and acknowledged receipt of service.

3. Defendant PlusFour's deadline to answer was April 20, 2020.

4. Based on Governor Sisolak's declaration of a public health state of emergency in Nevada as a result of COVID-19, and the accompanying directive for non-essential businesses to shut down, PlusFour, Inc. has suspended operations.

5. In light of the COVID-19 pandemic and office closings, PlusFour, Inc. and its counsel

1 require additional time to investigate and respond to the allegations and claims made by Plaintiff.
2 Accordingly, the parties agree to grant PlusFour, Inc. an initial extension of the deadline to respond
3 to Plaintiff's Complaint to May 19, 2020.

4 6. This Stipulation is made in good faith, not for the purposes of delay, and granting it will
5 not prejudice any party. This extension of time will allow PlusFour, Inc. time to investigate the
6 allegations and claims raised by Plaintiff's Complaint, confer with counsel, and prepare its
7 response. This is Defendant PlusFour's first request for an extension of time.

8 7. On April 27, 2020, PlusFour, Inc.'s counsel conferred with Plaintiff's counsel regarding
9 the basis for this request and its need for an extension. Plaintiff's counsel had no objections and
10 approved a 21-day extension in response to the request.

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1 WHEREAS, the parties hereby stipulate and agree, pursuant to LR IA 6-2, , that Defendant
 2 PlusFour's time to answer, move or otherwise respond to Plaintiff's Complaint in this action is
 3 extended through and including **May 19, 2020.**

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5 Dated this 5 th day of May 2020	6 Dated this 5 th day of May 2020
7 SHUMWAY VAN	8 PRICE LAW GROUP
9	10
11 <u>By: /s/ Garrett R. Chase</u> Garrett R. Chase, Esq. Nevada Bar No. 14498 8985 S. Eastern Avenue Suite 100 Las Vegas, Nevada 89123 Phone: (702) 478-7770 Email: garret@shumwayvan.com <i>Attorneys for Defendant</i> <i>PlusFour, Inc.</i>	12 <u>By: /s/ Steven A. Alpert</u> Steven A. Alpert, Esq. Nevada Bar No. 8353 5940 S. Rainbow Blvd. Suite 3014 Las Vegas, Nevada 89118 Phone: (702) 794-2008 Email: alpert@pricelawgroup.com <i>Attorneys for Plaintiff</i> <i>Mark A. Smitherman.</i>
13	14
15 Dated this 29 th day of April 2020	16 Dated this 29 th day of April 2020
17 CLARK HILL PLLC	18 NAYLOR & BRASTER
19	20
21 <u>By: /s/ Jeremy J. Thompson</u> Jeremy J. Thompson, Esq. Nevada Bar No. 12503 3800 Howard Hughes Parkway Suite 500 Las Vegas, Nevada 89169 Phone: (702) 862-8300 Email: jthompson@clarkhill.com <i>Attorneys for Defendant</i> <i>Equifax Information Services, LLC</i>	22 <u>By: /s/ Jennifer L. Braster</u> Jennifer L. Braster, Esq. Nevada Bar No. 9982 1050 Indigo Drive Suite 200 Las Vegas, Nevada 89145 Phone(702) 420-7000 Email: jbraster@naylorandbrasterlaw.com <i>Attorneys for Defendant</i> <i>Experian Information Solutions, Inc</i>
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ORDER

IT IS SO ORDERED.

DATED this 6th day of May, 2020.

UNITED STATES MAGISTRATE JUDGE

Submitted by:

SHUMWAY VAN

By: /s/ Garrett R. Chase

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